

**Bayer CropScience**

1963

Information in EPA's files indicates that Stauffer Chemical Company ("Stauffer") owned and operated a chemical manufacturing facility on property located at or near 2<sup>nd</sup> and Price Streets in Trainer, Pennsylvania ("Property") from approximately 1920-1933; that Stauffer produced chemicals including sulfuric acid, carbon disulfide, dithiocarbonic anhydride, and sodium hydrosulfide at the Property; that Stauffer constructed and/or operated a lagoon/settling pond on the Property between 1953-1959; and that "filter cake" was disposed of in the lagoon.

1. Please state whether any lagoons, ponds, pits, landfills, or other temporary or permanent disposal areas (collectively "Units") were constructed and/or used at the Property during the time Stauffer operated there.
2. For each Unit identified, please:
  - a. Identify where the Unit was located on the Property;
  - b. Provide a copy of all documents which refer or relate to the construction or opening of the Unit;
  - c. Provide a copy of all documents which refer or relate to the closing or discontinued use of the Unit by Stauffer;
  - d. Provide a copy of all documents which refer or relate to the cleanout of such Unit at any time;
  - e. Identify when Stauffer began to use the Unit;
  - f. Identify when Stauffer ceased using the Unit;
  - g. Identify all wastes placed into the Unit during the time Stauffer used the Unit;

- h. Identify all hazardous substances contained within wastes placed into the Unit;
  - i. Provide a copy of all documents which refer or relate to the wastes placed into the Unit including, without limitation, all analyses of samples taken from such waste;
  - j. Describe the processes from which the wastes placed into the Unit were generated;
  - g. Describe all actions taken to modify, close, clean out, and/or remediate the Unit (your response should include, without limitation, the date each action was commenced, the nature of such action, and the date such action was completed); and
  - h. Provide a copy of all documents which refer or relate to each action identified in response to 2(g), above.
- 3. State whether filter cake was disposed of at any time on the Property or into Stoney Creek during the period Stauffer operated at the Property. For each instance in which filter cake was so disposed, please:
  - a. Identify where on the Property or within Stoney Creek such filter cake was disposed;
  - b. Identify the process from which such filter cake was generated including, without limitation, the materials that would have flowed through the filter to produce the filter cake and the materials that would have passed through the filter;
  - c. Identify the composition of such filter cake including, without limitation, the hazardous substances contained within such filter cake;

- d. Provide a copy of all documents which refer or relate to the composition of the filter cake including, without limitation, the results of any analytical testing performed on such filter cake; and
  - e. Provide a copy of all documents which refer or relate to the disposal of such filter cake on the Property.
4. Identify all wastes and by-products resulting from the manufacture of the chemicals and materials produced at the Property during the time Stauffer operated at this location. For each such waste and by-product stored or disposed of on the Property or into Stoney Creek at any time:
- a. Identify the waste/by-product;
  - b. Identify when such waste/by-product was stored or disposed of on the Property or in Stoney Creek;
  - c. Identify where on the Property or in Stoney Creek such waste/by-product was stored or disposed;
  - d. Identify how such waste/by-product was stored or disposed (e.g., placed into a lagoon);
  - e. Identify the composition of such waste/by-product including, without limitation, hazardous substances contained within such waste/by-product;
  - f. Identify the process from which such waste/by-product was produced;
  - g. Provide a copy of all documents which refer or relate to the composition of such waste/by-product including, without limitation, the results of any analytical testing performed on such waste/by-product; and

- h. Provide a copy of all documents which refer or relate to the storage or disposal of such waste/by-product on the Property.
- 5. State whether there were any releases or spills of hazardous substances at the Property and/or to Stoney Creek during the time Stauffer owned or operated at the Property. For each such spill or release:
  - a. Identify the date on which the spill or release occurred;
  - b. Identify the location on the Property or in Stoney Creek where such spill or release occurred;
  - c. Identify the material spilled or released including, without limitation, the hazardous substances contained within the material spilled or released and the volume of material spilled or released;
  - d. Identify all efforts to contain or clean up the spill or release including, without limitation, the date on which any such efforts commenced, the activities taken, and the date on which such efforts were completed;
  - e. Identify the process from which such spill or release occurred;
  - f. Provide a copy of all documents which refer or relate to the composition of the materials spilled or released including, without limitation, any results of analytical testing performed on the spilled/released material;
  - g. Provide a copy of all documents which refer or relate to the spill or release.
- 6. Provide a copy of all environmental assessments and investigations performed at the Property or in Stoney Creek by or on behalf of Stauffer at any time.

7. State whether PCBs and/or PCB-containing equipment was present at the Property during the period Stauffer owned and/or operated at the Property. For each piece of PCB-containing equipment present at the Property during such period:
- a. Identify the piece of equipment (e.g., transformer);
  - b. State when such piece of equipment was first used on the Property;
  - c. State when use of such piece of equipment was discontinued;
  - d. Identify each instance in which PCB-containing materials were installed into and/or removed from such equipment;
  - e. [DO WE HAVE STANDARD PCB QUESTIONS?????] *Ask Curlym*

**Rohm & Haas** ✓

Information in EPA's files indicates that drums/barrels were taken from Rohm & Haas facilities to the Metro Container Corporation Site located at or near 2<sup>nd</sup> and Price Streets in Trainer, Pennsylvania, by Sukonik Barrel and Drum Company ("Sukonik") and Tunnel Barrel and Drum Company ("Tunnel"); and that such drums/barrels had previously contained, among other things, "pesticides," "paints," "lacquers," "varnishes," "gums," "resins," and "plastic solvents."

1. Please identify, and provide a copy of, each contract and agreement between Rohm & Haas and Sukonik relating to the transportation of drums/barrels to or from any Rohm & Haas facility.

2. Provide a copy of all correspondence between Rohm & Haas and Sukonik which refers or relates to the transportation by Sukonik of drums/barrels to or from any Rohm & Haas facility.
3. Please identify, and provide a copy of, each contract and agreement between Rohm & Haas and Tunnel relating to the transportation of drums/barrels to or from any Rohm & Haas facility.
4. Provide a copy of all correspondence between Rohm & Haas and Tunnel which refers or relates to the transportation by Tunnel of drums/barrels to or from any Rohm & Haas facility.
5. For each Rohm & Haas facility that Tunnel and/or Sukonik transported drums/barrels to or from, identify:
  - a) the address of the facility; and
  - b) the products/materials produced at such facility between 1980-1988;
  - c) the processes used between 1980-1988 to produce the products/materials produced at such facility;
  - d) the raw materials used in the such processes;
  - e) all wastes and by-products generated between 1980-1988 from such processes;
  - f) all chemicals/constituents that would have been present in drums/barrels present at any time between 1980-1988 at the facility;
  - g) the chemicals/constituents contained in the drums/barrels transported to or from the facility by Tunnel and/or Sukonik.
6. For each raw material and waste/by-product identified in response to Question 5:

- a) identify the chemical composition.
- b) provide a copy of all documents which refer or relate to the composition of such raw material and waste/by-product including, but not limited to, chemical analyses performed on such raw materials and wastes/by-products; and
- c) identify how each waste/by-product was disposed of between 1980 and 1988.

### **Tunnel Barrel**

Information in EPA's files indicates that drums/barrels were taken from Rohm & Haas facilities to the Metro Container Corporation Site located at or near 2<sup>nd</sup> and Price Streets in Trainer, Pennsylvania, by Tunnel Barrel and Drum Company ("Tunnel") in the 1980s.

1. Please identify, and provide a copy of, each contract and agreement between Rohm & Haas and Tunnel relating to the transportation of drums/barrels to or from any Rohm & Haas facility.
2. Provide a copy of all correspondence between Rohm & Haas and Tunnel which refers or relates to the transportation by Tunnel of drums/barrels to or from any Rohm & Haas facility.
3. Identify the address of all Rohm & Haas facilities from which or to which Tunnel transported drums/barrels in the 1980s.
4. For each Rohm & Haas facility that Tunnel transported drums/barrels to or from, identify the dates on which Tunnel transported such drums/barrels.
5. For each date identified in response to Question 4, above, identify:

- a) the number of drums/barrels transported;
  - b) the destination of such drums/barrels;
  - c) the contents of each drum/barrel when transported;
  - d) the last known contents of each drum/barrel alleged to have been empty when transported;
  - e) any markings on the drums/barrels transported.
6. For each date on which Tunnel transported drums/barrels to the Metro Container Site from any Rohm & Haas facility:
- a) State whether Tunnel was directed to transport such drums/barrels to the Metro Container Site by Rohm & Haas or any other person or entity and, if so, identify the person or entity that provided such instruction and the date on which such direction was provided;
  - b) Provide a copy of all documents which refer or relate to any instruction or direction by Rohm & Haas or any other person or entity to transport drums/barrels to the Metro Container Site.

### **Zenith**

Information in EPA's files indicates that approximately 600 drums/barrels were taken from Zenith's facilities to the Metro Container Corporation Site located at or near 2<sup>nd</sup> and Price Streets in Trainer, Pennsylvania, between 1986-1988 and that such drums/barrels had previously contained, among other things, "paint," "oil," "electroplating chemicals," and/or "solvents."

1. Please describe the activity(ies)/process(es) conducted at the Zenith facility(ies) which used paint formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.



2. Please identify the chemical constituents of the paint used at the Zenith facility(ies) which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
3. Provide a copy of all documents which refer or relate to the chemical constituents of the paint used at the Zenith facility(ies) which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
4. Please describe the activity(ies)/process(es) conducted at the Zenith facility(ies) which used oil formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
5. Please identify the chemical constituents of the oil used at the Zenith facility(ies) which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
6. Provide a copy of all documents which refer or relate to the chemical constituents of the oil used at the Zenith facility(ies) which was formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
7. Please describe the activity(ies)/process(es) conducted at the Zenith facility(ies) which used electroplating chemicals formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
8. Please identify the chemical constituents of the electroplating chemicals used at the Zenith facility(ies) which were formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.

9. Provide a copy of all documents which refer or relate to the chemical constituents of the electroplating chemicals used at the Zenith facility(ies) which were formerly contained in drums/barrels that were sent or may have been to the Metro Container Site.
10. Please describe the activity(ies)/process(es) conducted at the Zenith facility(ies) which used solvents formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
11. Please identify the chemical constituents of the solvents used at the Zenith facility(ies) which were formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.
12. Provide a copy of all documents which refer or relate to the chemical constituents of the solvents used at the Zenith facility(ies) which were formerly contained in drums/barrels that were or may have been sent to the Metro Container Site.